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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SENECA A. DURR,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-01907-APG-BNW

**JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REMAND**

(Fourth Request)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for Defendant to file her response to Plaintiff's Motion for Reversal/Remand be extended from May 9, 2019 to **May 15, 2019**. This is Defendant's fourth request for extension. Good cause exists to grant Defendant's request for extension. Since the time of the last extension, Counsel has been taking care of her elderly mother following the death of Counsel's uncle and two cousins. Counsel's mother is scheduled for surgery and was out of the office on the date of the current filing deadline to take her mother to the hospital. Due to unexpected leave, Counsel respectfully requests additional time to adequately review the transcript and respond to the issues raised in Plaintiff's

1 Motion. Defendant makes this request in good faith with no intention to unduly delay the proceedings.
2 Defendant apologizes for the belated request for extension, but filed an extension of time as soon as
3 reasonably practicable. The parties further stipulate that the Court's Scheduling Order shall be
4 modified accordingly.
5

6 Respectfully submitted,

7 Dated: May 9, 2019

/s/ Joshua Harris

(*as authorized by email on May 9, 2019)

JOSHUA HARRIS

Attorney for Plaintiff

11 Dated: May 9, 2019

NICHOLAS A. TRUTANICH

United States Attorney

DEBORAH LEE STACHEL

Regional Chief Counsel, Region IX

Social Security Administration

15 By /s/ Tina L. Naicker

TINA L. NAICKER

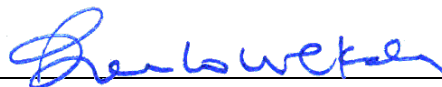
Special Assistant U.S. Attorney

Attorneys for Defendant

18 **ORDER**

19 APPROVED AND SO ORDERED:

20 DATED: May 14, 2019



21 THE HONORABLE BRENDA WEKSLER
22 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

I, TINA L. NAICKER, certify that the following individual was served with a copy of the **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION FOR REMAND** on the date and via the method of service identified below:

CM/ECF:

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Attorneys for Plaintiff

Respectfully submitted this 9th day of May 2019,

/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney